

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*, §
Plaintiffs, §
v. § CIVIL ACTION NO. 2:13-CV-00193
GREG ABBOTT, *et al.*, §
Defendants. §

DEFENDANTS' ADVISORY REGARDING REMEDIES BRIEFING

Defendants file this advisory to correct statements made in their recent briefing on remedies. South Carolina's photo-ID voting law with a reasonable-impediment-declaration procedure was precleared under Voting Rights Act § 5 in 2012 by the United States District Court for the District of Columbia—not by the Department of Justice, as erroneously stated by defendants (D.E. 1049 at 8, 18; D.E. 1047 at 11). *South Carolina v. United States*, 898 F. Supp. 2d 30, 35, 48 (D.D.C. 2012).

North Carolina's photo-ID voting law with a reasonable-impediment-declaration procedure was cited in the same parenthetical as South Carolina's law. D.E. 1049 at 8; D.E. 1047 at 11; D.E. 1035 at 7. The North Carolina law was not precleared by the Department of Justice, as the preclearance regime did not cover any States by 2015. *See Shelby County v. Holder*, 133 S. Ct. 2612, 2631 (2013). Rather, as defendants noted, the reasonable-impediment-declaration procedure of North Carolina's law was deemed “[e]specially significant” by Judge Higginson's concurring opinion in *Veasey v. Abbott*. 830 F.3d 216, 279 (5th Cir. 2016) (en banc) (Higginson, J., concurring).

Date: July 12, 2017

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 12, 2017, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ Angela V. Colmenero
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